

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JULIA JIN-WOLFSON, *on behalf of herself  
and all others similarly situated,*

Plaintiff,

v.

LAFAYETTE COLLEGE,

Defendant.

Case No. 5:23-cv-04005-JMG

**PLAINTIFF’S MOTION FOR AWARD OF ATTORNEYS’  
FEES, COSTS, AND CASE CONTRIBUTION AWARD  
TO SETTLEMENT CLASS REPRESENTATIVE**

Through undersigned counsel, Plaintiff Julia Jin-Wolfson (“Plaintiff”) respectfully moves this Court for approval of reasonable attorneys’ fees, costs, and case contribution award to Settlement Class Representative pursuant to the proposed Stipulation of Settlement that this Court preliminarily approved in its Order dated March 24, 2025. Plaintiff moves for an award of attorneys’ fees in the amount of \$152,234.78 and litigation expenses in the amount of \$83,772.90 with such amounts to be paid from the Settlement Fund in accordance with the terms of the Settlement. Plaintiff additionally moves for a Case Contribution Award to the Settlement Class Representative in the amount of \$7,500.00. In further support of this Motion, Plaintiff refers the Court to the attached memorandum of law and the Declarations of Nicholas A. Colella and Michael Tompkins.

Dated: June 9, 2025

Respectfully submitted,

/s/ Nicholas A. Colella  
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*\*Pro Hac Vice*

*Attorneys for Plaintiff*

**CERTIFICATE OF SERVICE**

I hereby certify that, on June 9, 2025, a true and correct copy of the foregoing was filed through the Court's Electronic Case Filing (ECF) System and that the following attorneys of record are registered to receive notice of said filing through ECF:

/s/ Nicholas A. Colella  
Nicholas A. Colella